

TOGUT, SEGAL & SEGAL LLP  
Bankruptcy Conflicts Counsel for Delphi Corporation, et al.,  
Debtors and Debtors-in-Possession,  
One Penn Plaza, Suite 3335  
New York, New York 10119  
(212) 594-5000  
Neil Berger (NB-3599)

**Hearing Date: 8/17/2007  
at 10:00 AM**

Delphi Legal Information Hotline:  
Toll Free: (800) 718-5305  
International: (248) 813-2698

Delphi Legal Information Website:  
<http://www.delphidocket.com>

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11  
: Case No. 05-44481 [RDD]  
DELPHI CORPORATION, et al., :  
: Debtors. : (Jointly Administered)  
:-----X

**NOTICE OF PRESENTMENT OF JOINT STIPULATION  
AND ORDER TO CONSOLIDATE CERTAIN CLAIMS  
(BANCO J.P. MORGAN, S.A., INSTITUCION DE BANCA MULTIPLE,  
J.P. GRUPO FINANCIERO, DIVISION FIDUCIARIA (IN ITS CAPACITY  
AS TRUSTEE OF TRUST F/00121), PRUDENTIAL FINANCIAL, INC.,  
PRUDENTIAL INVESTMENT MANAGEMENT, INC., PRUDENTIAL REAL  
ESTATE INVESTORS (A DIVISION OF PRUDENTIAL INVESTMENT  
MANAGEMENT, INC.), PLA HOLDING VI, LLC, THE PLA INDUSTRIAL  
FUND I, LLC AND PLA MEXICO INDUSTRIAL MANAGER I LLC)**

**PLEASE TAKE NOTICE** that on October 31, 2006, Delphi Corporation and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"), objected to proofs of claim number 12833, 12834, 12835, 12836, 12837, 14649 and 14650 (the "Proofs of Claim" or the "Claims") filed by Banco J.P. Morgan, S.A., Institucion De Banca Multiple, J.P. Grupo Financiero, Division Fiduciaria (in its capacity as Trustee of Trust F/00121), Prudential

Financial, Inc., Prudential Investment Management, Inc., Prudential Real Estate Investors (a division of Prudential Investment Management, Inc.), PLA Holding VI, LLC, the PLA Industrial Fund I, LLC and PLA Mexico Industrial Manager I LLC (collectively, the "Claimants") pursuant to the Third Omnibus Objection (Substantive) Pursuant To 11 U.S.C. § 502(b) And Fed. R. Bankr. P. 3007 To Certain (A) Claims With Insufficient Documentation, (B) Claims Unsubstantiated By Debtors' Books and Records, (C) Claims Subject To Modification and (II) Motion To Estimate Contingent And Unliquidated Claims Pursuant To 11 U.S.C. §502(c) (Docket No. 5452).

**PLEASE TAKE FURTHER NOTICE** that the Debtors and the Claimant have agreed to settle the Objection with respect to the Proofs of Claim and, pursuant to the Order Under 11 U.S.C. §§ 363, 502, And 503 And Fed. R. Bankr. P. 9019(b) Authorizing Debtors To Compromise Or Settle Certain Classes Of Controversy And Allow Claims Without Further Court Approval (Docket No. 4414), have executed a Joint Stipulation and Order To Consolidate Certain Claims (the "Joint Stipulation").

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Joint Stipulation, the Debtors and the Claimants have agreed, among other things, to consolidate the parallel claims asserted by multiple Claimants into a single claim in a fixed amount.

**[Concluded on the following page]**

**PLEASE TAKE FURTHER NOTICE** that the Debtors will present the Joint  
Stipulation for consideration at the hearing scheduled for August 17, 2007, at 10:00 a.m.  
(prevailing Eastern time) in the United States Bankruptcy Court for the Southern  
District of New York.

Dated: New York, New York  
August 9, 2007

DELPHI CORPORATION, *et al.*  
By their attorneys,  
TOGUT, SEGAL & SEGAL LLP  
By:

/s/ Neil Berger  
NEIL BERGER (NB-3599)  
A Member of the Firm  
One Penn Plaza  
New York, New York 10119  
(212) 594-5000